REMARKS/ARGUMENTS

The applicants have reviewed the Final Office Action mailed on 12/22/2005 and the art cited therein, and submit this paper as a reply thereto. The applicants request entry of the above claim revisions and consideration of these comments.

Currently pending in the present application are claims 1-22. Claims 23-42 were cancelled solely to expedite prosecution of this application, and without waiver, prejudice, or disclaimer of the applicants' rights to direct claims to this subject matter in the future.

Art-Based Rejections

Claims 1-7, 9-13, and 16-22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,293,745 A to Hurd in view of "LATA Map" to Nathan Stratton ("Stratton") and U.S. Patent No. 4,956,835 A to Grover.

Claims 1-22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,011,844 A to Uppaluru et al. ("Uppaluru") in view of "ATM Theory and Application" to McDysan et al. ("McDysan") in further view of "LATA Map" to Nathan Stratton ("Stratton") and U.S. Patent No. 4,956,835 A to Grover.

Currently amended claim 1 more clearly defines and more clearly describes certain terms. For example, where applicable, a type of call receiving unit, such as a VRU was described, a first and second switch was specifically described as a first ATM switch and a second ATM switch and a programmable switch was defined as being disposed between the VRU and the first ATM switch. Further, references to the hub where narrowed. For example, incoming telephone calls are noted to be received and processed at the VRU specifically and not the hub generally, and wherein the programmable switch specifically and not the hub generally is programmed to route each of the calls to their proper remote sites.

In the Office Action on page 3, the Examiner stated that, "in the event of a system failure, the hub switch 23 may be programmed to route the call to the appropriate route location based upon the *dialed number DNIS*, and not necessarily *the internal DNIS*." Examiner further stated that Applicant provided no support in their remarks for the amendment.

Applicant respectfully believes that there is proper support for such a remark in the specification. Referring now to page 14, page 17, page 22, and figure 2, please note that the programmable switch 24 is positioned between the VRU 22 and the ATM switch 28 (for example please see figure 2). Referring now to page 14, lines 3-20, the DNIS for each call is used to route the call. After the call is processed at the VRU 22, the VRU creates a connection to a switch 24 and connects the incoming call to the switch 24. The VRU 22 assigns an internal DNIS that associates the call with its destination at the proper remote location. The internal DNIS associated with the call by the VRU is used by the system (for example, please see figure 2, and page 10, lines 15-21) to route the call to its proper destination.

Referring now to page 17, lines 1-4 and 17-21, the ATM switch 28 uses the internal DNIS associated with the call to route the call to its proper remote location, and the ATM network 32 delivers the call to the remote location 12 to which the call is routed by the ATM switch 28.

For the reasons discussed above, which are fully supported by the specification, the programmable switch 24 which is disposed between the VRU 22 (which assigns an internal DNIS and which creates a connection to the programmable switch 24 and connects the incoming call to the programmable switch 24) and the ATM switch 28 (which uses the internal DNIS associated with the call to route the call), the programmable switch 24 must receive the internal DNIS from the VRU 22 and provide that internal DNIS to the ATM switch 28. Referring now, for example, to figure 2, and to page 14 it is clear that the VRU 22, which assigns an internal DNIS that associates the call with its destination, creates a connection to the programmable switch 24 and then connects the incoming call to the programmable switch 24.

Referring now to page 22, lines 3-8, in the event of a system failure, the programmable switch 24 may be programmed to route the call to the appropriate remote location based upon the dialed number DNIS. Per the previous comments, it is clear that the VRU is able to receive a DNIS and assign an internal DNIS for use when the VRU 22 connects the incoming call to the programmable switch 24. As such, Applicant believes that currently amended claim 1 fully supported by the specification.

More specifically, currently amended claim 1, advantageously describes, among other elements, that the incoming telephone calls received and processed at the VRU are each assigned an internal Dialed Number Information Service (DNIS) that associates each of the calls with their proper remote sites, wherein the first ATM switch uses the internal DNIS associated with each of the calls to route the calls to their proper remote sites, and wherein the programmable switch is programmed to route each of the calls to their proper remote sites in an event of a system failure, based upon the internal DNIS associated with each of the calls.

Neither Hurd, Stratton, Uppaluru, McDysan, and Grover teach or suggest:

providing telecommunications features to live operators in a geographically-distributed call receiving center for an inbound telemarketing campaign;

receiving and processing incoming telephone calls at a VRU and assigning an internal DNIS by the VRU that associates each of the these incoming telephone calls with their proper remote sites;

using the internal DNIS associated with each of the calls, by a first ATM switch, to route the calls to their proper remote sites; and

programming to route each of the calls, by a programmable switch, to their proper remote sites in an event of a system failure, based upon the internal DNIS associated with each of the calls;

wherein the programmable switch is connected between the first ATM switch and the VRU, and wherein the programmable switch, the first ATM switch, and the VRU are all contained in a common hub.

As such, Applicant believes currently amended claim 1 is condition for allowance and respectfully request it be passed to allowance. Currently pending claims 2-22 depend on currently amended independent claim 1 which applicants believe is in condition for allowance. Therefore, applicants believe the dependent claims 2-22 are in condition for allowance and respectfully request that they be passed to allowance.

Although, Applicant has included an RCE with the present amendment, Applicant believes that the current amendment is fully supported by the specification. As such, Applicant respectfully requests that the current amendment be entered without necessitating the use of the RCE.

The applicants request entry, consideration, and favorable action on this response at the earliest convenience of the Office.

Respectfully submitted,

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Dated: 03/22/2006 By. _____

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